VI.A. Assessment of Program Effectiveness

Permit Compliance

The City of Santa Clarita takes great pride in being a responsible steward of the Santa Clara River and setting a good example for the community. The City strives to maintain habitat and keep wildlife corridors open along the Santa Clara River in addition to complying with issues related to water quality. A great deal of effort is being made to meet the intent of the NPDES permit to ensure the City is making the best use of limited resources. The numerous elements of the permit are centralized through the City's Environmental Services Division that coordinates its implementation by working in conjunction with other City divisions.

Though the City established a dedicated Stormwater Utility Fee to charge all property owners within the City to fund the costs of complying with the NPDES permit, the funding source is not able to fully fund all permit requirements. With increasing permit demands and finite funding sources, in 2009 the City was forced to compromise items such as reducing the frequency of street sweeping. Prior to this time, all streets were swept once per week. Then the frequency was reduced to once per month for certain portions of the year. Priority A streets are swept once per week throughout the year. The remaining streets are swept every week throughout the time of year when leaves are falling, and once per month during the rest of the year. This schedule was continued for the current fiscal year and has maintained its effectiveness in keeping trash and debris out of the storm drain system. In 2009, the City purchased a "Vactor" truck for storm drain maintenance that also has video capability to screen the inside of the storm drain system. In fiscal year 2010/11, the City televised 3800 feet of the storm drain system.

The permit requirement to place trash containers at every bus stop has also proven to be a challenge. In order to accomplish this requirement in a cost-effective, efficient manner, the City utilized the Department of Conservation Block Grant to pay for trash and recycling containers. Sheltered bus stop locations can accommodate a trash container, but the City has received complaints in regard to Americans with Disabilities Act (ADA) indicating containers at certain bus stops hinder disabled persons utilizing the bus stop and surrounding sidewalks. Another challenge to be addressed is designing a container that has a pleasing visual appearance, keeping in mind that in order for automated collection by the waste hauler, the containers must be designed to be emptied using the automated trash truck's hydraulic arm. Additionally, many of the containers have been vandalized, leading to poor appearance and general blight in neighborhoods. The City continues to install trash cans at bus stops, but is evaluating site conditions on a case—by-case basis to ensure safety, accessibility, and other factors.

Evaluation

Evaluation of our stormwater program is based on trends similar to information contained in the Annual Report. The City continues to focus primary efforts on strategies to comply with permit requirements. The City does this while seeking the most cost-effective methods to comply with the intent of the permit. Trends in the type of illicit discharges, their location and responsible party are being tracked. Also, as required by the permit, the amount of debris being removed from catch basins is recorded and provided in this report. Other items to consider are the trends of certain constituents at the mass emission monitoring station. This information coupled with qualitative information, such as the performance of the storm drain system during heavy rain seasons and the public's response to outreach and educational information, indicates the program is performing well.

Strengths and Weaknesses of the Stormwater Program

There are many strengths with Santa Clarita's stormwater program. The City's outreach efforts remain strong, and these efforts help encourage residents to report illegal dumping and increase awareness of stormwater issues for the Santa Clara River. For instance, the local outreach program includes handouts, newspaper advertisements, magazine advertisements, radio ads, television ads, giveaways, special events and other activities that are highlighted throughout the Annual Report. In an attempt to address funding for the Stormwater program, the City embarked on a Proposition 218 ballot election campaign to update the methodology of the Stormwater Utility Fee, include a Consumer Price Index (CPI) adjuster cap, and change the rate by which the fee is based. This vote was passed during the 2009/10 Fiscal Year, and in Fiscal Year 2010/11 the City completed the administrative process to implement the new rate. But the greatest strength of the City of Santa Clarita's Stormwater Program is its staff members. In spite of limited resources, staff continues to search for creative ways to ensure the program work as effectively and efficiently as possible.

The Santa Clarita Storm Drain Maintenance program continues to provide quality service to the community and has maintained the City-owned catch basins to the high standards of the permit. This year's rain season brought days of heavy rainfall on several occasions. The catch basins yielded significant amounts of debris. As a result of the City's established cleaning program and pre-planning for the storm events, clogging of catch basins was kept to a minimum during heavy storms. Utilizing heavy vacuum equipment and experienced personnel directly responsible to the Environmental Services Division has kept this program focused, the storm drains clean, and the system in compliance with the permit. The Storm Drain Maintenance component of the Environmental Services Division is very responsive to citizen's maintenance and odor issues and in addition to the routine cleaning of the catch basins.

Field inspectors actively seeking illicit discharges and connections reflects the proactive approach the City has taken with the Illicit Connection/Illicit Discharge (IC/ID) program. The IC/ID database is used for tracking complaints, discharges and connections. Inspectors use laptop computers in the field to collect pertinent information and review locations for prior incidents. The database allows the inspectors to generate monthly and annual reports for review and to discover trends. The database tracks specific types of discharges and plots them on a map, allowing the City to determine areas of pollutant specific concerns, which in turn provides locations to be monitored more frequently and/or be targeted for mailings of specific outreach materials. Inspectors, as part of their enforcement activities, also hand out brochures to residents and businesses which offer information on proper disposal methods, IC/ID and recycling.

Screening of the closed storm drain system in priority areas was commenced last fiscal year, but due to staff limitations, only a small portion was completed. This fiscal year, 3800 feet of closed storm drain was screened.

Construction and development continued to be slow this past fiscal year due to economic issues. As a result, the number of Standard Urban Stormwater Mitigation Plans (SUSMP) and Stormwater Pollution Prevention Plans (SWPPP) the City processed is far lower than in previous years. The City retained the services of two consultants, AEI-CASC Engineering and California Watershed Engineering, both of which have engineering staff specializing in reviewing SUSMPs and SWPPPs. Having consultant engineers dedicated to the SUSMPs and SWPPPs allows direct communication with the developers/engineers regarding the stormwater details of their individual projects. This has led to better understanding and compliance with the SUSMP by developers that do business with the City. The SUSMP is a standard part of the development process and many developments are being subjected to this requirement. However, it remains a challenge to the development community to comply with the Regional Board's interpretation of the permit requirement to treat and infiltrate stormwater runoff from their projects. It has proven difficult to dedicate areas on projects to infiltrate water in addition to having the right soil conditions to percolate particularly in northern Los Angeles County. Developers of multiple Priority Projects have learned with each project what is expected for the City to accept their project for storm water requirements. Educating developers and engineers during the Development Review Committee meeting, over the counter review of site plans, in the field, over phone conversations and the plan check process is ongoing.

In December of 2009, the EPA ordered an audit of the construction and demolition portions of the NPDES permit. The overall results showed compliance with permit requirements, but as with all programs, there is always an opportunity for improvement. As a result of the audit, the City revised their Standard Operating Procedures for the inspectors and doubled our efforts to improve tracking. The City is currently working with the Information Technology Division to improve the systems for better tracking of inspections.

In 2010/11, two presentations were given by City Environmental Services staff to the Development Advisory Committee (consisting of local developers and engineers) regarding the Construction Permit rule change and proper Best Management Practices. Also this fiscal year, 14 staff from the various City divisions (including Environmental Services, Development Services, Building and Safety, Capital Improvements and Parks Planning) attended training for the Stormwater Program requirements for the new General Construction Permits (Qualified SWPPP Practitioner and Qualified SWPPP Developer training).

Highlights and Accomplishments

The City is proud to continue the annual River Rally event in September to coincide with Pollution Prevention Week. This event encourages residents of the Santa Clarita Valley to participate in collecting trash and debris in various sections of the Santa Clara River. Last year's event had over 1400 volunteers. The message the City is getting out about storm water pollution prevention is well received. The River Rally event is more popular every year, allowing for increased educational opportunities. Residents actively participating and viewing the physical effects on the local water body has created a sense of environmental stewardship within the community. In 2009, the River Rally event resulted in the collection of approximately 8500 pounds of trash, and in 2010, 16,000 pounds of trash. Since the events inception, volunteers have collected over 294,000 pounds of trash from the Santa Clara River.

The City continued its working relationship with the Los Angeles County Sanitation Districts with outreach materials educating the community about the chloride Total Maximum Daily Load (TMDL) compliance as well as the effects of self-regenerating water softeners and the chloride they generate and add to the river. The Santa Clarita Valley Sanitation District and the City has worked for more than 10 years to work with the Regional Board and various stakeholders to develop a cost-effective and environmentally-sound plan to comply with the State-mandated Chloride Total Maximum Daily Load (TMDL). Although Santa Clarita has taken the unprecedented step of removing over 7300 automatic water softeners which were a major source of chloride, and local water agencies have documented reduced chloride levels in the imported water supply, additional measures are needed to bring the Sanitation District into State compliance. The Sanitation District is continuing efforts to meet this TMDL.

In 2009, the City introduced the free Manure Recycling Program through our franchise residential waste hauler, Waste Management (WM). Residents can contact WM at (661)-259-2398 for unlimited free containers for green waste, and unlimited free watertight carts for the disposal of green waste and manure. Commercial size carts are also available from WM for purchase. When the program was first introduced in 2009, two newsletters and a reverse-phone call were made to all horse properties in the City to notify horse owners of the program. Another newsletter was mailed this year to continue promoting the program. In 2010/11, 1600 tons of manure was recycled, up from the 965 tons that were recycled in the previous year. Proper containment and disposal of manure prevents polluted runoff by averting rainwater from mixing with manure piles.

The program is free, convenient (carts can easily be rolled to the curb for pick-up), and reduces odors and flies.

In 2009, the City also introduced the Sharps Program which allows residents to conveniently and responsibly dispose of needles, lancets, syringes and other Sharps from their homes. This service is offered through the City's franchised residential hauler, Waste Management. On an annual basis, one free Sharps Mail-Back container is delivered by Waste Management to residents who are enrolled in the program. A second container is available to residents at a cost of \$5.00. Senior citizens who are enrolled in the program receive two free containers per year; a third container is available at a cost of \$5.00; fourth and subsequent containers are available at a cost of \$30.00. In addition to returning the container by mail, residents can also drop off their Sharps container at a S.A.F.E. Collection Center or at a Household Hazardous Waste Round-Up Event. To date, 700 households are participating in this free program.

Interagency Coordination

In cooperation with the Los Angeles County Sanitation Districts, education continued this year on the chloride Total Maximum Daily Load (TMDL) compliance issue. Targeted specifically towards owners of self-regenerating water softeners within the Santa Clarita Valley, the educational efforts focused on notifying current owners of these systems that they are now illegal and to permanently remove them from service. Residents have continued to remove these systems and to date over 7300 water softeners have been removed. Efforts have also continued to persuade local retailers to remove water softener salt from their shelves to further encourage residents to stop using the salt based water softeners. Cooperation between the Sanitation Districts also continued in the efforts to comply with the chloride Total Maximum Daily Load (TMDL).

The Santa Clara River Watershed has a mass emissions monitoring station in the Los Angeles County unincorporated/City of Santa Clarita area, directly below the 5 Freeway near Magic Mountain Parkway. Los Angeles County Department of Public Works uses the station for mass emission monitoring.

In previous years, the City participated in a watershed-wide monitoring program sponsored by the Sanitation Districts of Los Angeles County. This effort focused on collecting information from various entities performing water quality monitoring in the upper and lower watershed to distribute the monitoring responsibilities in such a manner that will provide for more coverage and less duplicating of efforts across agencies. The outcome is expected to be better and more efficient monitoring of the watershed as a whole. The process has languished this year, but the participants have not cancelled the program. The City will continue to participate if and when the process resumes.

The City also participates in the Santa Clara River Committee of Watershed Coalition of the Ventura County IRWMP. This allows the City to understand and participate in the processes that are occurring in the lower watershed to better correlate the efforts ongoing in all reaches of the watershed and to verify that the intent of preservation and protecting the entire watershed is coordinated between both IRWMP groups.

The City is also part of the Integrated Regional Watershed Management Plan (IRWMP) for the Upper Santa Clara River Watershed. The IRWMP includes the City, Rivers and Mountains Conservancy, Castaic Lake Water Agency, Los Angeles County Flood Control District, Newhall County Water District, Santa Clarita Water Division, Santa Clarita Valley Sanitation District of Los Angeles County, and Valencia Water Company as well as various stakeholders including environmental groups, members of local town councils and local residents. The purpose of the IRWMP is to integrate planning and implementation efforts and facilitate regional cooperation with the goals of reducing water demand, improving operational efficiency, increasing water supply reliability, improving water quality, and improving resource stewardship.

The IRWMP reflects the unique needs of the Upper Watershed, which encompasses the City of Santa Clarita, the communities of Castaic, Stevenson Ranch, West Ranch, Agua Dulcé and Acton, various unincorporated areas in Los Angeles County, open space areas of the Santa Monica Mountains Recreation and Conservation Authority, Los Angeles County Department of Parks and Recreation, and portions of the Angeles National Forest. A grant application for Proposition 84 funds is anticipated which will be utilized on projects aimed at reducing runoff and improving habitat.

The Regional Board adopted the Bacteria TMDL in July 2010. The State Water Resources Control Board is currently reviewing the TMDL. It is anticipated in Spring 2012, the federal government will complete the approval process. Cities and counties within the Santa Clara River watershed began meeting this year to discuss coordination efforts for implementation and monitoring plans to comply with the Bacteria TMDL.

The Los Angeles Stormwater Permit Group met regularly this year to discuss the Los Angeles County NPDES MS4 Permit. Topics discussed included proposed permit structure, TMDL incorporation, low impact development, and monitoring and reporting.

Future Plans

The City of Santa Clarita is an active participant in the IRWMP for the Upper Santa Clara River Watershed. The purpose of the IRWMP is to integrate planning and implementation efforts and facilitate regional cooperation with the goals of reducing water demands, improving operational efficiency, increasing water supply reliability, improving water quality, and improving resource stewardship. It will provide ongoing guidance and prioritization regarding implementation projects, for Proposition 50 and Proposition 84 Grants and other funding sources. The IRWMP is

the product of a collaborative stakeholder process conducted under the direction of the Regional Watershed Management Group (RWMG). In an effort to adequately represent the Region, a Regional Watershed Management Group (RWMG) was formed by a Memorandum of Understanding (MOU) in 2007. This fiscal year, two contracts funded through Proposition 84 were signed, one for the Salt and Nutrient Management Plan, and another to have the IRWMP document updated. Future plans include entering into a new MOU, initiating contracts with the Department of Water Resources to begin the Proposition 84 Implementation Grant, and increasing outreach efforts to encourage a more diverse stakeholder participation.

The City is currently working with three other cities (Santa Paula, Fillmore and Ventura), Los Angeles County and Ventura County regarding the Bacteria TMDL. Various meetings have been held and City staff has been working with stakeholders to develop a monitoring plan to determine where the sources of bacteria originate so an implementation plan can be developed.

Suggestions to Improve the Effectiveness of the Program

The City of Santa Clarita is constantly striving to improve all of its processes, duties and activities of the Stormwater Program. Aside from the need to find additional funding for the many aspects of the NPDES permit, the Stormwater Program is very strong and is well situated to maintain good water quality in the Santa Clara River. Ways are being sought to increase public awareness and outreach and to implement innovative programs while operating at current staffing levels. The City would like to further customizing the stormwater program activities and BMPs to our community's pollutants of concern to ensure maximum benefit to the environment.